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<b>Full Name</b>	Grant Scarsdale
<b>Mailing Address</b>	303 Oxford Lane, Harrison, AR 72601
<b>Affiliation (if applicable)</b>	Buffalo River Watershed Alliance
<b>Your connection to Arkansas waters</b>	I'm a photographer and outdoor enthusiast that relies on tourism on the Buffalo National River
<b>Has nuisance algae affected your recreation experiences?</b>	Yes
<b>How are you affected by Arkansas Water Quality</b>	I am an Arkansas resident. I have a business or property in Arkansas. I own property near a river, stream, lake, or spring. I recreate on or near a river, lake, or stream. My income is impacted by Arkansas water quality (e.g. fishing guide, outfitter, rental owner, or tied to other tourist related industries).
<b>Nuisance Algae</b>	
<b>Provide specific information about the waterbody or waterbodies where nuisance algae have been observed.</b>	I have seen an increase in nuisance algae near (and downstream for several miles of) the confluence of Big Creek and the Buffalo River at the Carver access. I have also seen a rise in algae in Cecil/Cove Creek and the Erbie area.
<b>In the examples you described above, would you consider observed algal densities to be "objectionable?"</b>	Yes, all were objectionable in my opinion.
<b>Habitat Degradation</b>	
<b>Have declines to physical habitat impacted your recreation experiences?</b>	Yes
	There is a grave concentration of silt and sedimentation that is entering the Buffalo National River from Adds Creek at the Ponca Bridge. A gravel mine upstream of Adds Creek and north of Ponca is causing destruction of riparian areas. I have

<p><b>Please describe your observations of water quality degradation due to changes in habitat.</b></p>	<p>personally seen the paddling negatively affected between Ponca and Kyles Landing in the last 5 years. In 2013, floating was pleasurable from Ponca all the way down to a level of 2.4' on the Ponca gauge, and floating was acceptable down to 2.0' from Steel Creek. This last year (2018), a level below 3.7' on the Ponca gauge was too low to comfortably float between Ponca and Steele Creek without having to portage and drag canoes. A level above 3.0' and higher is required for a comfortable float between Steele Creek and Kyles Landing. Channels are filling up with gravel. This is especially noticeable in a stretch of gravel (that was a deep riffle less than 5 years ago) approximately 1/2 mile immediately downstream of Ponca access.</p>
<p><b>How are you impacted by water quality degradation attributed to habitat declines?</b></p>	<p>My recreation and opportunities for photography while canoeing are dramatically reduced by the increase of sediment in the river.</p>
<p><b>Categorical Determinations</b></p>	
<p><b>Do you believe in state-led local approaches?</b></p>	<p>No</p>
<p><b>Do you think it is important to ensure federal regulations are met when proposing a plan to restore significant state and federal natural resources, such as the Buffalo National River?</b></p>	<p>Yes</p>
<p><b>Do you believe it is important for any plan to include both point and nonpoint sources of pollution?</b></p>	<p>Yes</p>
<p><b>At this time, do you believe ADEQ should follow the Clean Water Act and federal regulations to prioritize impaired waterbodies for a TMDL until they have provided adequate recommended documentation (2016 IRG) and met all legal requirements (40 CFR 130.7)?</b></p>	<p>Yes</p>
<p><b>Federal Requirements</b></p>	

**Do you believe ADEQ should consider peer-reviewed literature, taxpayer funded research, expert reports, and agency recommendations to identify and report water quality impairments?**

Yes

**35% of variable 106 Grant Funding received by the state each year is dependent on impairment listings. When assessment methodologies are lacking or absent, how should the state proceed with assessment decisions?**

Even though I understand I would have the opportunity to review justifications and provide public comments on any 303(d) listings utilizing best professional judgement and a weight-of-evidence approach, I do not support ADEQ making any case-by-case decisions when methodologies were not predetermined.

**How strongly do you feel that designated Outstanding National Resource Waters (e.g., Buffalo, Strawberry, Spring, Eleven Point, and Mulberry Rivers) should be allowed to violate water quality standards LESS frequently than channelized streams (aka ditches)?**

Very strongly. We have a limited number of waters with ONRW designations in the state. As "The Natural State" we should hold our most protected waters to a higher level of expectation.

**When numeric criteria do not exist, and narrative descriptions of water quality standards are in place, how do you think the state should proceed with assessments?**

Consider all relevant data and information and take a weight-of-evidence approach to developing a determination. The state must provide a rationale and supporting documentation with assessment decisions. As long as the state is forthcoming and transparent, I believe best professional judgement, supported with scientific evidence, has an appropriate place in this regulatory process.

**States are required to develop their lists based on EPA approved Water Quality Standards. Although states may anticipate changes, states are not allowed to incorporate revised criteria until**

Yes. The EPA approval process ensures water quality standards

<p><b>EPA has approved them for Clean Water Act purposes (e.g., development of list of impaired waters). Do you think this federal requirement is important to follow?</b></p>	<p>are backed by defensible science. This is essential for protecting and restoring water quality.</p>
<p><b>Do you believe pictures should be considered for determining if water quality criteria are being met, such as determining whether algae have reached "objectionable" densities?</b></p>	<p>Yes</p>
<p><b>Do you think waterbodies should be listed as impaired when scientifically defensible research confirms population declines to federally threatened and endangered species?</b></p>	<p>Yes. Of course. Properly identifying waters is important to the recovery of imperiled species.</p>
<p><b>Additional Comments</b></p>	
<p><b>Please provide any additional comments you may have on Arkansas's Draft 2018 303(d) List of Impaired Waterbodies.</b></p>	<p>The Buffalo National River and Big Creek (that enters the Buffalo at Carver) should be listed as Category 5 streams that require TMDL studies and capacities to restore stream health.</p>
<p><b>Will you be submitting pictures to ADEQ in a separate email or have you already?</b></p>	<p>Maybe</p>
<p><b>Do you wish to grant White River Waterkeeper permission to post your comments on our website?</b></p>	<p>Yes</p>
<p><b>Do you think ADEQ should post comments on their website as they come in, and as is</b></p>	<p>Yes. This is important to public transparency, allows commenters to ensure their comments were received, and</p>

**standard protocol for other administrative procedures carried out by the Department?**

serves as a valuable resource to the public and press.

**Do you have any scientific reports or studies that you wish to submit to ADEQ to supplement your comment record?**

No